

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

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Docket No. N2012-1

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS
WITNESS BRATTA (NPMHU/USPS-T-5-1-6)

Pursuant to Rule 26 of the Commission's Rules of Practice and Procedure, the National Postal Mail Handlers Union ("NPMHU") hereby submits the following interrogatories to USPS witness Dominic Bratta, USPS-T-5. If necessary, please redirect any interrogatory to a more appropriate USPS witness.

Instructions and Definitions

"USPS" or "Postal Service" means the United States Postal Service, its employees, agents, witnesses, and all other persons who act under the direction of the United States Postal Service, including but not limited to consultants and other independent contractors.

"Mail Processing Network Rationalization Service Changes, 2012" or "MNPR" means the proposed restructuring of the USPS's mail distribution and transportation network presented to the PRC in its December 5, 2010 "Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services."

“MNPR Network” means the mail distribution and transportation network required to implement the USPS’ MNPR and that, inter alia, accommodates the USPS’s elimination of 252 mail processing facilities.

“Documents” has the meaning as ascribed within the federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the USPS.

“Losing facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook.

“Gaining facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook. The term document has the same meaning as ascribed within the federal Rules of Civil Procedure.

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

INTERROGATORIES

NPMHU/USPS - T-5-1 Referring to your response to APWU/USPS-T4-9, redirected from witness Neri to you, in which you stated that, for each of the P&DCs that have been closed since 2008, the “Postal Service selected from several options, including sale, lease, termination, maintenance for storage or other operations, lease or vacancy.”

- (a) Please identify any properties that the Postal Service owns that it is trying to sell, including in your answer how long the property has been for sale and at what price(s).
- (b) Please identify any properties that are vacant that the Postal Service is not currently trying to sell, including the assessed value of the property.
- (c) Please list all properties sold by the Postal Service since January 1, 2008, including the sale price and the number of days on the market prior to sale.

NPMHU/ USPS -T-5-2 Referring to your response to PR/USPS-T4-4(h), redirected from witness Neri, you state that “[p]reventative maintenance, corrective maintenance, and operational maintenance increase as machines run for longer periods” and reference Library Reference 59 for more information.

- (a) Please state whether there is any formula or formula for estimating the increase(s) in maintenance costs relative to increase in machine run times. If so, please provide that formula(s) and explain how it has been applied in this case.

(b) If the answer to (a) is no, please explain how the Postal Service has accounted for these increased costs in estimating the costs and savings associated with the redesigned network

(c) Please explain how Library Reference 59 explains or quantifies the increase in maintenance costs associated with increased run time, including in your answer specific reference to specific documents within Library Reference 59.

NPMHU/ USPS -T-5-3 Referring to your response to APWU/USPS-T5-2, you state that the “actual number of [mail processing equipment] units depends on the results of the AMP studies and implementation of the Network Rationalization Initiative.”

Please provide the expected number of each type of mail processing equipment after network consolidation, given and assuming the implementation of the AMP decisions announced by the Postal Service on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>.

NPMHU/ USPS -T-5-4 Please provide revised costs savings for maintenance and facilities costs savings, as summarized in Table 16 of the testimony of witness Bradley, given the results of the AMP decisions announced by the Postal Service on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>, which include thirty AMP decisions that were disapproved, several studies ongoing, and only twenty-one studies that resulted in a decision to fully close the facility.

NPMHU/ USPS -T-5-5 Referring to the results of the AMP decisions announced by the Postal Service on February 23, 2012, and published at

<http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>:

- a) What costs are anticipated to be incurred in facilities and maintenance where a facility loses its originating mail processing, but not its other functions?
- b) What costs are anticipated to be incurred in facilities and maintenance where a facility loses its destinating mail processing, but not its other functions?
- c) What costs are anticipated to be incurred in facilities and maintenance where a facility loses its originating and destinating mail processing, but not its other functions?

NPMHU/USPS --T5-6 Referring to the results of the AMP decisions announced by the Postal Service on February 23, 2012, and published at

<http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>:

- a) Please identify all facilities currently under lease that, based on the decisions announced February 23, 2012, the Postal Service will vacate. For all such facilities, state the current end of lease date, and any penalties associated with early termination of the lease.
- b) Please identify all facilities currently owned by the Postal Service that, based on the decisions announced February 23, 2012, the Postal Service will vacate and intends to sell.

- c) Please explain the status and future plans for any facilities not included in your response to (a) or (b) where the decision announced February 23, 2012, was a “full” consolidation.

Respectfully submitted,

Patrick T. Johnson
As agent for and authorized by
Andrew D. Roth
Kathleen M. Keller
Bredhoff & Kaiser, P.L.L.C.
805 Fifteenth Street, N.W.
Suite 1000
Washington, DC 20005
(202) 842-2600

*Counsel for National Postal
Mail Handlers Union*

February 24, 2012